## CRIMINAL COMPLAINT (Electronically Submitted)

United States District Court	DISTRICT of ARIZONA
United States of America v.	DOCKET NO. 4 - 0 8 5 5 0 M J
Bianca Leticia Molina; DOB: 1984; United States	MAGISTRATE'S CASE NO.
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Complaint for violation of Title 8 United States Code '1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

## COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

On or about February 15, 2024, in the District of Arizona, **Bianca Leticia Molina**, knowing or in reckless disregard that certain aliens, including Alajandro Perez-Perez, Evil Esau Doblado-Mencia, and Carmelino Juan-Juan, had come to, entered, and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain; in violation of **Title 8**, **United States Code**, **Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i)**.

## BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On or about February 15, 2024, in the District of Arizona (San Miguel), United States Border Patrol Agents (BPAs) responded to an Integrated Fixed Tower (IFT) visual of a white van with markings and insignia resembling an official United States Border Patrol vehicle traveling south on Newfield Road. The van traveled to approximately a few hundred feet north of the International Boundary Fence (IBF) and stopped. The IFT observed approximately 15 people approach and enter the van. BPAs determined that there were no other BPAs in the area at that time and four BPAs went to assess the situation. Upon BPAs arrival, multiple people exited and ran in different directions from the van. The driver was identified as **Bianca Leticia Molina**. BPAs were able to apprehend 10 passengers from the vehicle. The ten passengers including Alajandro Perez-Perez, Evil Esau Doblado-Mencia, and Carmelino Juan-Juan were determined to be Mexican, Guatemalan, and Honduran citizens illegally present in the United States. Upon closer inspection of the van, BPAs were able to confirm that the van was marked to superficially appear to be a Border Patrol transport vehicle; however, the markings were fraudulent, and the van was not a Border Patrol vehicle.

Records checks revealed that Alajandro Perez-Perez, Evil Esau Doblado-Mencia, and Carmelino Juan-Juan did not have the proper immigration documentation to enter or remain in the U.S. legally.

Material witness Alajandro Perez-Perez stated that he is a citizen of Mexico. He crossed the IBF as part of a group and hid. A Border Patrol van pulled up to the group and Perez realized it was fake. The group got into the van and Perez heard a female voice in the driver's seat talking on the phone. They traveled for approximately five minutes until they were pulled over by BPAs. When shown a photo lineup, Perez positively identified **Molina** as a woman who was arrested with him but was not part of his original group when he crossed the IBF.

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MATERIAL WITNESSES IN RELATION TO THE CHARGE: Alejandro Perez-Perez, Evil Esau Doblado-Mencia, and Carmelino Juan-Juan

Detention Requested  Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT MATTHEW D MOONEYHAM MOONEYHAM Date: 2024.02.19 14:19:29-07'00'
	OFFICIAL TITLE
	Homeland Security Investigations Agent
Sworn by telephone <u>x</u>	
SIGNATURE OF MAGISTRATE JUDGA <sup>1)</sup>	DATE
<sup>1)</sup> See Federal rules of Criminal Procedure Rules 3, 4.1, and 54	February 20, 2024
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Material witness Evil Esau Doblado-Mencia stated that he is a citizen of Honduras and had arranged to be smuggled into the United States for \$5,600 USD. Doblado crossed the IBF as part of a group consisting of approximately 11 people. Two or three foot guides instructed the group prior to crossing to walk in a straight line to pickup location where a vehicle would come and pick all 11 people up. Doblado and the others followed the directions to the pickup location next to a dirt road in the middle of the desert. A white passenger van with a painted diagonal green stripe arrived to the group's location and stopped. The passenger door opened and Doblado followed the others inside. He heard an English-speaking female driver attempting to communicate with the group in English. They rode for approximately five minutes until they were stopped by BPAs.

Material witness Carmelino Juan-Juan stated that he is a citizen of Guatemala and had arranged to be smuggled into the United States for \$20,000 USD. Juan crossed the IBF as part of a group and observed a van. He entered the van and heard the female driver with red hair speaking in English. When shown a photo lineup, Juan positively identified **Molina** as not part of his original group that had crossed the IBF. Juan stated that he had seen her at the Border Patrol station.

In a post-*Miranda* statement, **Molina** stated that she was going through a hard time and needed to provide for her kids. She met a person on Instagram who posted a job as a driver. **Molina** claimed she did not know how much she would be paid but knew she would be driving a vehicle and some people. **Molina** was picked up by a car and taken to a gas station in Three Points, Arizona. A van was there with directions inside where she was supposed to go to pick up some people. **Molina** said she was to take the people to a place in Tucson, Arizona, but she did not know where in Tucson.